

U.S. Department of Justice

United States Attorney Eastern District of New York

JN/DKK/LB/CJN F. #2017R05903

271 Cadman Plaza East Brooklyn, New York 11201

October 23, 2020

By Email and ECF

Thomas C. Green Mark D. Hopson Michael Levy Joan M. Loughnane Sidley Austin LLP

David Bitkower Matthew S. Hellman Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. <u>See</u> ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. <u>The Government's Discovery</u>

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Documents related to Quintel	Discovery Material	DOJ_HUAWEI_A_0007721231 –
Technology v. Huawei Technologies,	("DM")	DOJ_HUAWEI_A_0007996423
et al., 15-CV-307 (ALM) (E.D.T.X)		
Blog post regarding Huawei	DM	DOJ_HUAWEI_B_0000007933-
		DOJ_HUAWEI_B_0000007936
Financial Institution Documents,	Sensitive Discovery	DOJ_HUAWEI_B_0000007937-
including Written Correspondence	Material	DOJ_HUAWEI_B_0000007958

Very truly yours,

SETH D. DUCHARME Acting United States Attorney

By: /s/ Julia Nestor

Alexander A. Solomon

Julia Nestor

David K. Kessler

Sarah Evans

Assistant United States Attorneys

(718) 254-7000

DEBORAH L. CONNOR

Chief, Money Laundering and Asset Recovery Section, Criminal Division

U.S. Department of Justice

By: /s/ Christian J. Nauvel

Laura Billings Christian J. Nauvel Trial Attorneys

JAY I. BRATT

Chief, Counterintelligence and Export

Control Section

National Security Division, U.S. Department

of Justice

/s/ Thea D. R. Kendler Thea D. R. Kendler By:

David Lim **Trial Attorneys**

Clerk of the Court (AMD) (by ECF) (without Enclosures) cc: